



EL SEGUNDO FIREFIGHTERS' ASSOCIATION

I.A.F.F. LOCAL 3682

Chris Thomason, President

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October 13, 2010

California State Lands Commission (CSLC)

Mr. Cy Oggins

Division Chief Environmental Planning

100 Howe Ave Suite 100 South

Sacramento, CA 95825-8202

**Re: Public Draft Environmental Impact Report for the Chevron El Segundo
Marine Terminal Lease Renewal Project
State Clearinghouse No. 2006031091 CSLC EIR No. 735**

Dear Mr. Oggins,

The El Segundo Fire Department (ESFD) is the City's first responder in fire and medical emergencies.

The El Segundo Firefighters Association (ESFA) represents all 51 firefighters and paramedics sworn to protect and defend residents and business owners here.

The ESFD's jurisdiction includes El Segundo's beach, extending three miles out, and encompassing the Chevron marine terminal located just offshore.

That's why the ESFA must state its strong reservations about the proposed 30-year lease extension for the marine terminal.

ESFA firefighters and paramedics contend that the marine terminal DEIR now being circulated for public comment by the CSLC is woefully inadequate and must be revised.

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Its assertion -- that Chevron's Marine Terminal Fire Control Plan (MTFCP) is adequate for dealing with the "fire and explosion" dangers related to the transfer of highly flammable crude oil and refined petroleum products taking place on a daily basis at the marine terminal -- is based on information that is inaccurate and out of date.

Consider these select passages from DEIR Section 4.1:

1) "The Refinery is also served by the City of El Segundo Fire Department. The City maintains two fire stations within El Segundo. Station No. 1 is normally manned with 10 personnel and is equipped with two engines, one paramedic unit, and one command vehicle. Eight personnel are normally on duty each day at Station No. 2. This station has one engine, a truck and a paramedic unit."

The ESFD Station No. 1 is no longer "normally" manned with 10 personnel due to severe staffing cuts made by Mayor Eric Busch and the El Segundo City Council majority. The DEIR suggests that 18 firefighters are on duty each day in El Segundo. Given recent cut backs, there are as few as 6 firefighters and paramedics on duty each day at Station No. 1. On any given day in El Segundo as few as 14 personnel are on duty. And that means one less engine is able to respond in any emergency. The DEIR must consider the impact this cut in fire personnel and equipment would have on a fire or explosion response at the marine terminal.

ESFA-1

2) "The Chevron El Segundo Fire Department holds regular training sessions and drills in conjunction with the city of El Segundo Fire Department."

While ESFD management personnel have discussed the MTFCP with Chevron executives and other agencies, not a single El Segundo firefighter or paramedic has ever participated in any training program or drill at the Chevron marine terminal. Should a fire or explosion occur at the marine terminal, the ESFD would set up a unified command and serve as Incident Commander (IC). As IC, should the ESFD fail to manage the emergency properly, could the City of El Segundo and its taxpayers be held accountable for monetary damage awards?

ESFA-2

3) "Chevron personnel notify the city of El Segundo when an incident occurs that may affect the public or when they are not able to handle the emergency without assistance."

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Given that the ESFD has jurisdiction, El Segundo's firefighters and paramedics are responsible for residents' lives and property. Having to rely on Chevron personnel to determine when the ESFD should be notified about an incident at the marine terminal could make it difficult – even impossible – for ESFD personnel to do their job safely and efficiently. The ESFD should be immediately notified anytime a fire or explosion occurs at the marine terminal.

ESFA-3

4) “Fire boats are available from the POLA and POLB to assist with fire suppression.”

While fireboats are available from the POLA and the POLB, a fireboat operated out of Marina del Rey by the Los Angeles County Fire Department (LACFD) is also available. It could arrive within minutes of a marine terminal fire and/or explosion. In fact, as IC, the ESFD would probably call on the LACFD immediately for help in a marine terminal emergency. Yet the LACFD, its significant capability or its highly trained personnel are not mentioned in the DEIR.

ESFA-4

In addition to the aforementioned DEIR assertions, the ESFA is also concerned about the 30-year term of the marine terminal lease extension.

Given recent history, El Segundo will likely face significant fiscal challenges and environmental concerns over the next 5 years – let alone the next 30 years. A shorter lease would allow Chevron to account for these changes in a timely manner and result in safer marine terminal operations in the future.

ESFA-5

Ensuring that El Segundo families and business owners are safe is our top priority. That's why the ESFA asks that these important fire safety and related lease length concerns are addressed in the Final Environmental Impact Report (FEIR).

My members and I await your prompt response. I look forward to working with you in the critical weeks ahead.

Sincerely,

Captain Chris Thomason
President, El Segundo Firefighters Association